

STIPULATING PARTIES SHOWN ON SIGNATURE PAGE

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

*In re Wells Fargo Mortgage
Discrimination Litigation.*

Case No. 3:22-cv-00990-JD

Honorable James Donato

**JOINT STIPULATION
REQUESTING MODIFICATION
OF SCHEDULING ORDER FOR
THE LIMITED PURPOSE OF A
SINGLE DEPOSITION**

Trial Date: December 9, 2024

1 Pursuant to Civil Local Rule 6-2, Plaintiffs and Defendant Wells Fargo Bank,
2 N.A. (“Wells Fargo”) (collectively, the “Parties”) hereby stipulate and request as
3 follows:

4 WHEREAS, on February 10, 2024, Plaintiffs’ counsel requested a date and
5 location from Wells Fargo’s counsel to take the deposition of Jeff Snow, Wells
6 Fargo’s Quantitative Analytic Consultant in its Risk Management Modeling
7 Department;

8 WHEREAS, on February 13, 2024, Wells Fargo’s counsel informed
9 Plaintiffs’ counsel that Mr. Snow lives in Provo, Utah and they could not make Mr.
10 Snow available the following week before the current discovery cutoff date of
11 February 22, 2024 (ECF No. 166);

12 WHEREAS, Wells Fargo’s counsel informed Plaintiffs’ counsel that the
13 earliest Mr. Snow could be available to sit for a deposition would be February 28,
14 2024;

15 WHEREAS, Wells Fargo’s counsel agreed Plaintiffs’ counsel could depose
16 Mr. Snow after the discovery cutoff date on February 28, 2024;

17 WHEREFORE, the Parties stipulate and agree, by and between Plaintiffs and
18 Wells Fargo through their respective counsels of record that they respectfully
19 request that the Court extend the discovery cutoff deadline of February 22, 2024, to
20 February 28, 2024, for the exclusive and limited purpose of the deposition of Jeff
21 Snow.

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1 DATED: February 21, 2024

ELLIS GEORGE LLP

2 By: /s/ Dennis S. Ellis

3 Dennis S. Ellis

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5 Los Angeles, California 90067

6 Telephone: (310) 274-7100

7 On behalf of Plaintiffs as Interim Lead Counsel

8
9 DATED: February 21, 2024

MCGUIRE WOODS LLP

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18 Attorneys for Defendant Wells Fargo Bank,
19 N.A.

20 DATED: February 21, 2024

WINSTON & STRAWN LLP

21 By: /s/ Amanda L. Groves

22 Amanda L. Groves

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26 Los Angeles, CA 90071

27 Telephone: (213) 615-1700

28 Attorneys for Defendant Wells Fargo Bank,
N.A.

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)

Pursuant to Civil Local Rule 5-1(h)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the signatories above.

DATED: February 21, 2024

ELLIS GEORGE LLP

By: /s/ Dennis S. Ellis

Dennis S. Ellis

On behalf of Plaintiff as Interim Lead Counsel

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[PROPOSED] ORDER
PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

HON. JAMES DONATO
U.S. DISTRICT COURT JUDGE